

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	17-33705
Antonio Parrish	)		
Debtor,	)	Chapter:	Chapter 13
	)		
	)	Judge:	Donald R. Cassling

**NOTICE OF MOTION**

**To:** Antonio Parrish, 16940 Merrill Ave., South Holland, IL, 60473  
  
Tom Vaughn, 55 E. Monroe St. #3850, Chicago, IL, 60603  
  
Office of the US Trustee, 219 S. Dearborn, Suite 873,  
Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on the 9<sup>th</sup> of May, 2019 at 09:30 a.m., I shall appear before the Honorable Judge Donald R. Cassling in 219 S. Dearborn St, Courtroom 619, Chicago, IL and then and there present the attached **MOTION TO ALLOW CLAIM AS TIMELY FILED**, a copy of which is attached hereto.

**By:** /s/Kyle Dallmann  
Kyle Dallmann

**CERTIFICATE OF SERVICE**

I, Kyle Dallmann, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, before the hour of 5:30 p.m., on April 24, 2019.

**By:** /s/Kyle Dallmann  
Kyle Dallmann

**Attorneys for the Debtor**

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

A.S. Bhasin M.D.  17680 Kedzie Ave Hazel Crest IL 60429	First Premier BANK Attn: Bankruptcy Dept. 601 S Minnesota Ave Sioux Falls SD 57104	Webbank/Fingerhut Attn: Bankruptcy Dept. 6250 Ridgewood Rd Saint Cloud MN 56303
Advocate Healthcare Bankruptcy Department PO Box 4251 Carol Stream IL 60197	LVNV Funding LLC Bankruptcy Dept. PO Box 10584 Greenville SC 29603	Nations Recovery Center, Inc. Bankruptcy Dept. PO Box 620130 Atlanta GA 30362
Advocate South Suburban Hosp. Bankruptcy Department PO Box 4251 Carol Stream IL 60197	First National Collection Bureau, Inc. Bankruptcy Department610 Waltham Way Lockwood NV 89434	Jefferson Capital Systems LLC Bankruptcy Dept. PO Box 7999 Saint Cloud MN 56302
Capitalone Attn: Bankruptcy Dept. 15000 Capital One Dr Richmond VA 23238	Franciscan Alliance Bankruptcy Dept 28044 Network Place Chicago IL 60673	
Chicagoland Allergy & Asthma Consult  6320 W. 159th St., Suite A Oak Forest IL 60452	Harris & Harris, LTD Bankruptcy Dept. 111 W Jackson Blvd Suite 400 Chicago IL 60604	
Equifax Attn: Bankruptcy Dept. PO Box 740241 Atlanta GA 30374	Illinois Department of Revenue Bankruptcy Department PO Box 64338 Chicago IL 60664-0338	
Estelle Copeland  1653 Somerset Ave Detroit MI 48230	Ingalls Health System Bankruptcy Dept PO Box 27685 Chicago IL 60673	
Illinois Child Support Enforce Bankruptcy Dept. 509 S. 6th St Springfield IL 62701	IRS Priority Debt Bankruptcy Dept. PO Box 7346 Philadelphia PA 19101	
Experian Attn: Bankruptcy Dept. PO Box 2002 Allen TX 75013	Michigan Dept of Health and Human S  333 S. Grand Ave P.O. Box 30195 Lansing MI 48909	
Fingerhut Direct Mrkting C/O Jefferson Capital SYST 16 Mcleland Rd Saint Cloud MN 56303	Midwest Title Loan  1610 N Illinois St. Belleville IL 62226	
	Transunion Attn: Bankruptcy Dept. PO Box 1000 Chester PA 19022	

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Debtor,	)	Chapter:	Chapter 13
	)		
	)	Judge:	Donald R. Cassling

**MOTION TO ALLOW CLAIM AS TIMELY FILED**

NOW COMES the Debtor, Mr. Antonio Parrish (the "Debtor"), by and through his attorneys, Geraci Law LLC, to present his **MOTION TO ALLOW CLAIM AS TIMELY FILED**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 11/10/2017.
3. The plan was confirmed by this Court on 05/17/2018.
4. Schedule E of the original petition \$44,352 owed to the Michigan Department of Health and Human Services for child support.
5. The deadline for governmental agencies to file claims expired 05/09/2018.
6. The Michigan State Disbursement Unit never filed a proof of claim.
7. On 05/12/2018, Debtor's attorney filed claim #8 on behalf of the Michigan State Disbursement Unit.

8. For the above listed reasons, movant proposes to allow its proof of claim as timely filed.

WHEREFORE, the Debtor, Mr. Antonio Parrish, prays this Court enter an order:

1. Allowing the proof of claim for the Michigan State Disbursement Unit as being timely filed,
2. And any other relief that this court allows just and proper.

/s/Kyle Dallmann  
Kyle Dallmann

**Attorneys for the Debtor**

Geraci Law L.L.C.

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Chicago, Illinois 60603

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